

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTORS INC., TEAM AUTO SALES LLC, ROBERT ANTHONY URRUTIA, 189 SUNRISE HWY AUTO LLC, NORTHSHORE MOTOR LEASING, LLC, BRIAN CHABRIER, individually and derivatively as a member of NORTHSHORE MOTOR LEASING, LLC, JOSHUA AARONSON, individually and derivatively as a member of 189 SUNRISE HWY AUTO, LLC, JORY BARON, 1581 HYLAN BLVD AUTO LLC, 1580 HYLAN BLVD AUTO LLC, 1591 HYLAN BLVD AUTO LLC, 1632 HYLAN BLVD AUTO LLC, 1239 HYLAN BLVD AUTO LLC, 2519 HYLAN BLVD AUTO LLC, 76 FISK STREET REALTY LLC, 446 ROUTE 23 AUTO LLC and ISLAND AUTO MANAGEMENT, LLC,

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY THOMASSON, DWIGHT BLANKENSHIP, MARC MERCKLING, MICHAEL LAURIE, THOMAS JONES, CPA, CAR BUYERS NYC INC., GOLD COAST CARS OF SYOSSET LLC, GOLD COAST CARS OF SUNRISE LLC, GOLD COAST MOTORS AUTOMOTIVE GROUP LLC, GOLD COAST MOTORS OF LIC LLC, GOLD COAST MOTORS OF ROSLYN LLC, GOLD COAST MOTORS OF SMITHTOWN LLC, UEA PREMIER MOTORS CORP., DLA CAPITAL PARTNERS INC., JONES, LITTLE & CO., CPA'S LLP, FLUSHING BANK, LIBERTAS FUNDING LLC, and J.P. MORGAN CHASE BANK, N.A.,

Defendants.

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Case No.: 2:23-cv-6188 (JMW)

**PLAINTIFFS' NOTICE OF
CROSS-MOTION FOR LEAVE TO
AMEND THE PLEADINGS**

PLEASE TAKE NOTICE that upon the Declaration of Emanuel Kataev, Esq., dated March 29, 2024, the exhibits annexed thereto, and the accompanying Memorandum of Law, Plaintiffs shall move this Court at the United States District Court for the Eastern District of New York, located at 100 Federal Plaza, Central Islip, NY 11722-4438, on a date and time to be set by the Court, for an Order, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, granting Plaintiffs leave to file a Third Amended Complaint in this case, and for such other and further relief as this Court may deem just, equitable, and proper.

Dated: Lake Success, New York
March 29, 2024

Respectfully submitted,

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Robert Anthony Urrutia*

Dated: New York, New York
March 29, 2024

Respectfully submitted,

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